

Hearing Date and Time: October 21, 2013 at 2:00 p.m. (prevailing Eastern Time)
Objection Deadline: October 14, 2013 at 4:00 p.m. (prevailing Eastern Time)

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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| In re: | : | x |
| MOTORS LIQUIDATION COMPANY, <i>et al.</i> , f/k/a General Motors Corp., <i>et al.</i> | : | Chapter 11 |
| Debtors. | : | Case No.: 09-50026 (REG) |
| | : | (Jointly Administered) |
| MOTORS LIQUIDATION COMPANY GUC TRUST, | : | |
| Plaintiff, | : | |
| v. | : | Adversary Proceeding |
| APPALOOSA INVESTMENT LIMITED PARTNERSHIP, <i>et al.</i> , | : | Case No.: 12-09802 (REG) |
| Defendants. | : | |

**JOINDER OF GENERAL MOTORS LLC TO MOTORS
LIQUIDATION COMPANY GUC TRUST'S MOTION FOR ENTRY OF
ORDER PURSUANT TO SECTIONS 105, 363 AND 1142 OF THE BANKRUPTCY
CODE AND BANKRUPTCY RULES 3020 AND 9019 APPROVING GLOBAL
SETTLEMENT OF GUC TRUST'S OBJECTIONS AND ADVERSARY PROCEEDING
RELATING TO NOVA SCOTIA NOTES, AMONG OTHER MATTERS**

1. General Motors LLC (“New GM”) hereby supports approval of the *Motors Liquidation Company GUC Trust’s Motion For Entry Of Order Pursuant To Sections 105, 363 And 1142 Of The Bankruptcy Code And Bankruptcy Rules 3020 And 9019 Approving Global Settlement Of GUC Trust’s Objections And Adversary Proceeding Relating To Nova Scotia Notes, Among Other Matters* [Docket No. 12512] (“9019 Motion”), filed by the Motors Liquidation Company GUC Trust (“GUC Trust”) on September 27, 2013.

2. New GM reserves its rights to be heard at the hearing on the 9019 Motion on any of the grounds set forth therein.

WHEREFORE, New GM respectfully requests that (i) the relief requested in the 9019 Motion be granted in its entirety; (ii) the proposed order annexed to the 9019 Motion as Exhibit “B” be entered in the form proposed by the GUC Trust; and (iii) it be granted such other and further relief as is just and proper.

Dated: New York, New York
October 16, 2013

Respectfully submitted,

/s/ Arthur Steinberg
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